

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	No. 4:23-CR-00162
vs.	:	
MATHEW LAMPI,	:	(CHIEF JUDGE BRANN)
DEFENDANT	:	Electronically filed

MOTION FOR ENLARGEMENT OF TIME
TO FILE PRETRIAL MOTIONS

AND NOW COMES the Defendant, Mathew Lampi, by and through his attorney, Joseph R. D'Andrea, Esquire, and files this Motion for Enlargement of Time to File Pretrial Motions and in support thereof, avers as follows:

1. By an Indictment, the Defendant was charged with Conspiracy, Title 18, U.S.C., Section 371 and Interstate Transport of Stolen Goods, Aid and Abet, Title 18, U.S.C., Section 2314, 2 within the Middle District of Pennsylvania;

2. A Pretrial Order has set the pretrial motion filing deadline of July 12, 2023;

3. The parties are presently engaged in the discovery process and in plea negotiations, which may eliminate the need for trial in this matter. The parties request an extension of time within which to file pre-trial motions in order to provide the Defendant sufficient time to receive and review discovery and to allow the parties to continue with their plea negotiations.

4. Due to the reasons set forth above, the parties jointly request an extension

of time of approximately thirty days to file pretrial motions.

5. It is respectfully submitted that the ends of justice will be served by a continuance of the date for the filing of pretrial motions for an additional period of approximately sixty days and the delay occasioned by this motion is excludable from the speedy trial calculation pursuant to 18 U.S.C. § 3161(h) (8) (a).

6. The Assistant United States Attorney Sean A. Camoni concurs with this Motion for Enlargement of Time to File Pretrial Motions in the above referenced matter.

WHEREFORE, the Defendant, Mathew Lampi, respectfully requests that this Honorable Court enlarge the time for the filing of pretrial motions for a period of approximately thirty (30) days.

Respectfully submitted,

s/Joseph R. D'Andrea
Joseph R. D'Andrea, Esquire
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320 N. Blakely Street,
Dunmore, PA 18512
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E-mail: joe@joedandrea.com

Dated: 19 July 2023

CERTIFICATE OF CONCURRENCE

I, Joseph R. D'Andrea, Esquire do hereby certify that on this date, I contacted Sean A. Camoni, Esquire, Assistant United States Attorney, and counsel advised that he concurs with the within **Motion for Enlargement of Time to File Pretrial Motions.**

s/Joseph R. D'andrea
Joseph R. D'Andrea, Esquire

Dated: 19 July 2023

CERTIFICATE OF SERVICE

I, Joseph R. D'Andrea, Esquire, do hereby certify that I electronically served, via e-mail, a copy of the foregoing **Motion for Enlargement of Time to File Pretrial Motions**, to the following:

Sean A. Camoni, Esquire
Assistant United States Attorney
William J. Nealon Federal Building
235 North Washington Ave.
Scranton, PA 18301

s/Joseph R. D'Andrea
Joseph R. D'Andrea, Esquire

Dated: 19 July 2023